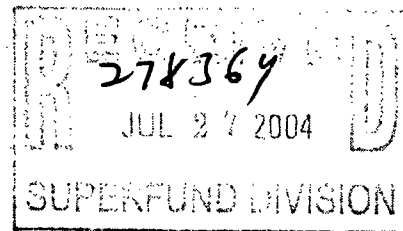


FILE COPY

JONES DAY

51 LOUISIANA AVENUE, N.W.
WASHINGTON, D.C. 20001-2113

TELEPHONE: 202-879-3939 • FACSIMILE: 202-626-1700



WRITER'S DIRECT NUMBER:
Direct Number: 202-879-7616
hhbumpers@jonesday.com

759870

July 22, 2004

Ms. Marsha A. Addams
U.S. Environmental Protection Agency, Region 5
77 West Jackson
Chicago, IL 60604-3507

Re: Pierce Waste Oil Services, Inc. Site - Springfield, IL.

Dear Ms. Addams:

On behalf of my client, Bridgestone/Firestone North American Tire, LLC ("BFNT"), I am following up on the April 26, 2004, letter from Schiff Hardin and your subsequent conversations with Jane Montgomery regarding errors in the EPA Volumetric Ranking Report for the Pierce Waste Oil Services Inc. site.

Enclosed is a preliminary chart of the alleged Firestone entities included in the Volumetric Ranking Report. The chart includes EPA's database allocation, the revised allocation based on the duplication of records or other errors, references to the shipment dates and documents, and a description of the errors. As the chart details, in many cases the volume calculations are based on double, triple or quadruple counting of the same waste.

There are also instances of transcription errors. The most significant of these errors is for the tire store referenced as Firestone Lafayette Square; party ID #18445. This store is ranked as the 22nd largest contributor of waste to the site at 1,202,460 gallons. Our review of the EPA records for this location indicates that only 1,110 gallons of waste oil were allegedly sent from this store, and therefore the EPA allocation is 1,000 times more than the actual waste volume from this location.

The second most conspicuous error is the triple listing of waste under the heading Bridgestone/Firestone, Party ID #10038 at 408,300 gallons; Firestone-Unknown City, Party ID #18466" at 290,033 gallons; and other Firestone entities, particularly Firestone-Decatur ID #18434 at 122,396 gallons. The chart is complete as to the Decatur double counting, but we are still trying to identify the source documents for the other entities included under "Bridgestone/Firestone" and "Firestone-Unknown City."

In the June 14, 2004 letter from Mr. Blaszak at Clean World Engineering, the EPA contractor that prepared the Waste Volume Report admits that "no effort was expended in identifying potential or actual duplicate records." Since these errors significantly impact the waste volume allocated to my client, I am respectfully requesting that EPA correct the database.

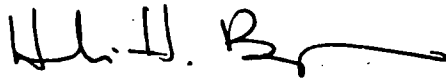
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Further, unless EPA requires its contractor to provide a reliable database, future negotiations with the PRP's will likely be focused on problems with the allocation, instead of settling the clean up of this site. Finally, it is my understanding that the same records and process were used to compile the databases for the A.A. Waste Oil and Dunavan Oil sites, and I am requesting, on behalf of my client, that EPA correct similar errors in the waste volume calculations for these sites.

Thank you for your consideration of this request.

Sincerely,

A handwritten signature in black ink, appearing to read "H. H. Bumpers", with a long horizontal flourish extending to the right.

Heidi Hughes Bumpers

ACCOUNTING COPY

PIERCE WASTE OIL SERVICE 04794

1925 EAST MADISON ST.
SPRINGFIELD, ILLINOIS 62703Date 5-2-87 Time In: _____ Meter No. 1746102
Time Out: _____Received of JackTruck License _____ Car Int'l No. _____ Marked Capy _____
Gals Water _____ Visual Capy _____ Unloaded By T-55No _____ Ours _____ No _____ Ours _____
Drums Rec'd _____ Theirs _____ Drums Ret'd. _____ Theirs _____Type Oil waste To Tank 14
Gross Gals. 4200 Ded _____ Net Gals _____

ANALYSIS		DEDUCTION	
BS & W	<u>12</u>	NO	
VIS @ 100		GALS	
FUEL DEL		PRICE	
FLASH		AMT	
ASH		TOTAL	\$
SPECTRO			

Anal'd By _____ Ext'd By _____ Ck'd By _____
GALLON READING FINISH-American Can
GALLON READING START

Gross Gallons _____

Carrier _____

On Sig re _____

FILE COPY

PIERCE WASTE OIL SERVICE 05417

1925 EAST MADISON ST.
SPRINGFIELD, ILLINOIS 62703Date 8-17-87 Time In: _____ Meter No. _____
Time Out: _____Received of RodneyTruck License _____ Car Int'l No. _____ Marked Capy _____
Gals Water _____ Visual Capy _____ Unloaded By T-55No _____ Ours _____ No _____ Ours _____
Drums Rec'd _____ Theirs _____ Drums Ret'd. _____ Theirs _____Type Oil waste To Tank F-4
Gross Gals. 3496 Ded _____ Net Gals _____

ANALYSIS		DEDUCTION	
BS & W	<u>1.2%</u>	NO	
VIS @ 100		GALS	
FUEL DEL		PRICE	
FLASH		AMT	
ASH		TOTAL	\$
SPECTRO			

Anal'd By _____ Ext'd By _____ Ck'd By _____
GALLON READING FINISHPeuch M.
American Can
GALLON READING START

Gross Gallons _____

Carrier _____

Driver's Signature _____